

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

Yakov Bratslavskiy, Plaintiff)

v.)

Michael Chertoff,
Secretary of the United States
Department of Homeland Security,)

Eduardo Aguirre, Jr., Director,
United States Citizenship and
Immigration Services)
and)

Denis Riordan, District Director,
United States Citizenship and
Immigration Services)
Defendants)

Case No. 05-11596 MLW

RECEIPT # 65940
AMOUNT \$ 250.00
SUMMONS ISSUED 3
LOCAL RULE 4.1 -
WAIVER FORM -
MCF ISSUED -
BY DPTY. CLK. M.P.
DATE 7/29/2005

MAGISTRATE JUDGE JLA

PLAINTIFF'S ORIGINAL COMPLAINT
FOR WRIT IN THE NATURE OF MANDAMUS

AND PETITION FOR HEARING ON NATURALIZATION APPLICATION
UNDER 8 USC §1447(b)

COMES NOW Yakov Bratslavskiy, Plaintiff in the above-styled and numbered cause,
and for cause of action would show unto the Court the following:

1. This action is brought against the Defendants to compel action on an application for naturalization properly filed by the Plaintiffs. In the alternative, Plaintiff moves this Honorable Court to adjudicate the Application, based on the authority granted to this Court by 8 U.S.C. § 1447(b). The application was filed and remains within the jurisdiction of the Defendants, who have improperly withheld action on said application to Plaintiff's detriment.

PARTIES

2. Plaintiff YAKOV BRATSLAVSKIY is a native of Russia and a permanent resident of the United States since August 1992. Upon fulfilling the 5-year physical presence requirement, as mandated by 8 USC §1427, Mr. Bratslavskiy applied for naturalization in March 2002.

3. Defendant Michael Chertoff is Secretary of the United States Department of Homeland Security (hereinafter "DHS"), and this action is brought against him in his official capacity. He is generally charged with enforcement of the Immigration and Nationality Act, and is further authorized to delegate such powers and authority to subordinate employees of the DHS. 8 USC §1103(a). The United States Citizenship and Immigration Services (hereinafter "CIS") is an agency within the DHS to whom the Secretary's authority has in part been delegated, and is subject to the Secretary's supervision.
4. Defendant Director Eduardo Aguirre, Jr. is an official of the CIS generally charged with supervisory authority over all operations of the CIS within the CIS with certain specific exceptions not relevant here. 8 CFR §103.1(g)(2)(ii)(B). As will be shown, Defendant Director is the official with whom Plaintiffs' application for lawful permanent resident status was properly filed.
5. Defendant District Director Denis Riordan is an official of the CIS generally charged with supervisory authority over all operations of the CIS within his District with certain specific exceptions not relevant here. 8 CFR §103.1(g)(2)(ii)(B). As will be shown, Defendant District Director is the official with whom Plaintiffs' application for naturalization is currently pending.

JURISDICTION

6. Jurisdiction in this case is proper under 28 U.S.C. §§1331 and 1361, 5 U.S.C. §701 *et seq.*, and 28 U.S.C. §2201 *et seq.*, as well as 8 U.S.C. § 1447(b), which states, in pertinent part:

If there is a failure to make a determination under [INA] §335 [8 U.S.C. §1446] before the end of the 120-day period after the date on which the examination is conducted under such section, the applicant may apply to the United States District Court for the District in which the applicant resides for a hearing on the matter. Such court has jurisdiction over the matter and may either determine the matter or remand the matter, with appropriate instructions to the Service to determine the matter.

Relief is requested pursuant to said statutes.

VENUE

7. Venue is proper in this court, pursuant to 28 USC §1391(e), in that this is an action against officers and agencies of the United States in their official capacities, brought in

the District where a Defendant resides and where a substantial part of the events or omissions giving rise to Plaintiff's claim occurred. More specifically, Plaintiff's application for naturalization was properly filed and, to Plaintiff's knowledge, remains pending with the Boston CIS District Director.

EXHAUSTION OF REMEDIES

8. Plaintiff has exhausted his administrative remedies. Plaintiff has, through his attorney, made numerous inquiries concerning the status of the application to no avail. An example of such inquiries in the form of a letter to an adjudications supervisor at the Boston CIS District Office, accompanies this Petition as **Exhibit A**.

CAUSE OF ACTION

9. All legal prerequisites having been satisfied, Plaintiff applied for naturalization with the CIS Vermont Service Center in September, 2003. Upon the initial processing of the case, and the completion of the required fingerprint check, the case was forwarded to the Boston CIS District Office for the interview.
11. Plaintiff was interviewed for his naturalization application on October 7, 2002, by CIS Officer Toni Swanson. At that time, Officer Swanson stated that even though Plaintiff had passed the tests of English and U.S. history and government, a decision could not be made about his application, without providing any further explanation. A copy of the Naturalization Interview Results sheet accompanies this Petition as **Exhibit B**. After repeated inquiries by Plaintiff and subsequently, by Plaintiff's counsel, CIS finally responded stating that "file is pending security checks".
12. In February 2005, Plaintiff received a second fingerprint notification from CIS. He promptly appeared for the scheduled fingerprint appointment and had his fingerprints taken again. **Based on the information from the Federal Bureau of Investigations, the FBI received Plaintiff's fingerprints on February 23, 2005, and forwarded them to the Boston CIS District electronically on the same day.**
13. Defendants have sufficient information to determine Plaintiff's eligibility pursuant to applicable requirements. To date, said application has not been adjudicated.
13. Defendants' refusal to act in this case is, as a matter of law, arbitrary and not in accordance with the law. Defendants willfully, and unreasonably, have delayed in and have refused to, adjudicate Plaintiff's applications for over three years, thereby depriving him of the right to a decision on his status and the peace of mind to which Plaintiff is entitled.

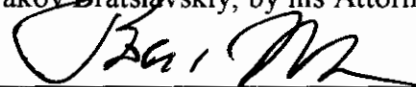
14. Plaintiff has been greatly damaged by the failure of Defendants to act in accord with their duties under the law.
 - (a) Plaintiff has further been damaged in that he continues to invest his time and money to make repeated case inquiries.
 - (b) Plaintiff has further been damaged by being deprived of the status of United States Citizen during the interminable pendency of his application.
15. The Defendants, in violation of the Administrative Procedures Act, 5 USC §701 *et seq.*, is unlawfully withholding or unreasonably delaying action on Plaintiff's application and have failed to carry out the adjudicative functions delegated to them by law with regard to Plaintiff's case.
16. Plaintiff has made numerous status inquiries in an attempt to secure adjudication of his application, all to no avail. Accordingly, Plaintiff has been forced to retain the services of an attorney to pursue the instant action.

PRAYER

17. WHEREFORE, in view of the arguments and authority noted herein, Plaintiff respectfully prays that the Defendants be cited to appear herein and that, upon due consideration, the Court enter an order:
 - (a) Adjudicating Plaintiff's Application for Naturalization pursuant to 8 U.S.C. § 1447(b), or, in the alternative,

requiring Defendants to adjudicate Plaintiffs application for naturalization pursuant to the Writ of Mandamus;
 - (b) awarding Plaintiff reasonable attorney's fees; and
 - (c) granting such other relief at law and in equity as justice may require.

Respectfully submitted,
Yakov Bratslavskiy, by his Attorney



Boris B. Maiden, Esq.
Law Office of Boris B. Maiden
251 Harvard Street, Suite 1
Brookline, MA 02446
617 739 6977
617 739 6774

LIST OF ATTACHMENTS

Exhibit Description

- A Plaintiff's Counsel's Letter to the Boston CIS District Office dated March 2, 2004
- B CIS Naturalization Interview Results;
- C CIS Application Receipt Notice, showing the Naturalization Application's receipt Date OF March 12, 2002.

BORIS B. MAIDEN
ATTORNEY AT LAW

251 HARVARD STREET SUITE 1 BROOKLINE MA 02446

BORIS B. MAIDEN*
KEVIN P. KEEFE
GREGORY ROMANOVSKY**

PHONE: (617) 739-6977
FAX: (617) 739-6774

OF COUNSEL
KENNETH J. GOLDBERG

*Also admitted in NY

**Member of American Immigration Lawyers Association

March 2, 2004

Adjudications Supervisor
Attorney Drop Box
Immigration and Naturalization Service
Government Center
JFK Federal Building
Boston, MA 02203

HAND DELIVERY

RE: N-400 Application of Yakov Bratslavskiy (A # 071-104-774)

Dear Sir or Madam:

Please be advised that this office represents the above-referenced individual in connection with his application for naturalization. My G-28 Form is enclosed for your records. Mr. Bratslavskiy was interviewed on 10/07/2002 (**1.5 years ago!**). He passed the tests of English and U.S. history and government, but there was no decision made on his case at the time.

Officer Toni Swanson, who conducted the interview, did not inform my client of the reason(s) why the case was not adjudicated at the time of the interview (I assume it was the usual "security check" delay). As a result, Mr. Bratslavskiy left the interview without any knowledge of what to expect. The only thing he was told was that "a decision cannot yet be made" about his application. He has been patiently waiting for 1.5 years, periodically spending hours in the information room line – just to be told that his case is still pending.

Please adjudicate the application as soon as possible. It is unfair to require my client to wait for so long to get the benefits he is eligible for. Thank you very much for your time and your prompt attention to this matter!

Truly yours,


Gregory Romanovsky

ENCLOSURES:

U.S. Department of Justice
Immigration and Naturalization Service

Naturalization Interview Results

A#: 071104777

On 10/7/02 you were interviewed by INS Officer TONI SWANSON

- ☒ You passed the tests of English and U.S. history and government.
- ☒ You passed the test of U.S. history and government and the English language requirement was waived.
- ☐ The Service has accepted your request for a Disability Exception. You are exempted from the requirement to demonstrate English language ability and/or a knowledge of U.S. history and government.
- ☐ You will be given another opportunity to be tested on your ability to _____ speak / _____ read / _____ write English.
- ☐ You will be given another opportunity to be tested on your knowledge of U.S. history and government.
- ☐ Please follow the instructions on the Form N-14.
- ☐ INS will send you a written decision about your application.
- ☐ You did not pass the second and final test of your _____ English ability / _____ knowledge of U.S. history and government. You will not be rescheduled for another interview for this N-400. INS will send you a written decision about your application.

A) _____ Congratulations! Your application has been recommended for approval. At this time, it appears that you have established your eligibility for naturalization. If final approval is granted, you will be notified when and where to report for the Oath Ceremony.

B) _____ A decision cannot yet be made about your application.

It is very important that you:

- ✓ Notify INS if you change your address.
- ✓ Come to any scheduled interview.
- ✓ Submit all requested documents.
- ✓ Send any questions about this application in writing to the officer named above. Include your full name, A-number, and a copy of this paper.
- ✓ Go to any oath ceremony that you are scheduled to attend.
- ✓ Notify INS as soon as possible in writing if you cannot come to any scheduled interview or oath ceremony. Include a copy of this paper and a copy of the scheduling notice.

Notice of Action



Receipt		NOTICE DATE April 01, 2002	
CASE TYPE N400 Application For Naturalization		INS A# A 071 104 774	
APPLICATION NUMBER ESC*000821183	RECEIVED DATE March 12, 2002	PRIORITY DATE March 12, 2002	PAGE 1 of 1

APPLICANT NAME AND MAILING ADDRESS
YAKOV BRATSLAVSKIY
11 HAGEN RD
NEWTON MA 02459

PAYMENT INFORMATION:
Single Application Fee: \$310.00
Total Amount Received: \$310.00
Total Balance Due: \$0.00

|||||

The above application has been received by our office and is in process. Our records indicate your personal information is as follows:

Date of Birth: June 04, 1954
Address Where You Live: 11 HAGEN RD
NEWTON MA 02459

Please verify your personal information listed above and immediately notify our office at the address or phone number listed below if there are any changes.

You will be notified of the date and place of your interview when you have been scheduled by the local INS office. You should expect to be notified within 365 days of this notice.

If you have any questions or comments regarding this notice or the status of your case, please contact our office at the below address or customer service number. You will be notified separately about any other cases you may have filed.

If you have other questions about possible immigration benefits and services, filing information, or INS forms, please call the INS National Customer Service Center (NCSC) at 1-800-375-5283. If you are hearing impaired, please call the NCSC TDD at 1-800-767-1833.


If you have access to the Internet, you can also visit INS at www.ins.usdoj.gov. Here you can find valuable information about forms and filing instructions, and about general immigration services and benefits. At present, this site does not provide case status information.

INS Office Address:
US IMMIGRATION AND NATURALIZATION SERVICE
75 LOWER WELDEN STREET
ST ALBANS VT 05479-

INS Customer Service Number:
(802) 527-4913

APPLICANT COPY

ESC\$000800987



CERTIFICATE OF SERVICE

I, Boris B. Maiden, attorney for the plaintiff, Yakov Bratslavskiy, hereby certify that on this 29th day of July, 2005, I have caused a true and accurate copy of the foregoing **Copmlaint**, to be mailed, postage pre-paid to the following defendants:

Alberto Gonzales
Attorney General
U.S. Department of Justice
950 Pennsylvania Ave, NW
Washinton, DC 20530-0001

Office of the General Counsel
U.S. Department of Homeland Security
Washington, DC 20528

Robert Divine
U.S. Citizenship & Immigration Services
20 Massachusetts Ave. NW
Washington, DC 20529

Denis Riordan
District Director
U.S. Citizenship & Immigration Services
JFK Federal Building
15 Sudbury Street
Boston, MA 02203


Boris Maiden

JS 44 (Rev. 11/04)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

Yakov Bratslavskiy

(b) County of Residence of First Listed Plaintiff
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

LAW OFFICE OF BORIS B. MAIDEN 617-739-6977
251 Harvard St, Ste 1, Brookline, MA 02446

DEFENDANTS

Michael Chertoff, DHS
Eduardo Aguirre, Jr., USCIS
Denis Riordan, USCIS

County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)

U.S.A.

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input checked="" type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 8 USC § 1447(b)

Brief description of cause: Defendants unreasonably delay adjudication of naturalization Application

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

7/29/05

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS1. Title of case (name of first party on each side only) Yakov Bratlavskiy v Michael Chertoff, DHS

2. Category in which the case belongs based upon the numbered nature of suit code listed on the civil cover sheet. (See local rule 40.1(a)(1)).

- I. 160, 410, 470, 535, R.23, REGARDLESS OF NATURE OF SUIT.
- ✓ II. 195, 196, 368, 400, 440, 441-446, 540, 550, 555, 625, 710, 720, 730, *Also complete AO 120 or AO 121 for patent, trademark or copyright cases
740, 790, 791, 820*, 830*, 840*, 850, 890, 892-894, 895, 950.
- III. 110, 120, 130, 140, 151, 190, 210, 230, 240, 245, 290, 310,
315, 320, 330, 340, 345, 350, 355, 360, 362, 365, 370, 371,
380, 385, 450, 891.
- IV. 220, 422, 423, 430, 460, 480, 490, 510, 530, 610, 620, 630, 640, 650, 660,
690, 810, 861-865, 870, 871, 875, 900.
- V. 150, 152, 153.

15 11596 MLW

3. Title and number, if any, of related cases. (See local rule 40.1(g)). If more than one prior related case has been filed in this district please indicate the title and number of the first filed case in this court.

4. Has a prior action between the same parties and based on the same claim ever been filed in this court?

YES ☐ NO ☒

5. Does the complaint in this case question the constitutionality of an act of congress affecting the public interest? (See 28 USC §2403)

YES ☐ NO ☒

If so, is the U.S.A. or an officer, agent or employee of the U.S. a party?

YES ☐ NO ☒

6. Is this case required to be heard and determined by a district court of three judges pursuant to title 28 USC §2284?

YES ☐ NO ☒7. Do all of the parties in this action, excluding governmental agencies of the united states and the Commonwealth of Massachusetts ("governmental agencies"), residing in Massachusetts reside in the same division? - (See Local Rule 40.1(d)).YES ☒ NO ☐A. If yes, in which division do all of the non-governmental parties reside?Eastern Division ☒ Central Division ☐ Western Division ☐

B. If no, in which division do the majority of the plaintiffs or the only parties, excluding governmental agencies, residing in Massachusetts reside?

Eastern Division ☐ Central Division ☐ Western Division ☐

8. If filing a Notice of Removal - are there any motions pending in the state court requiring the attention of this Court? (If yes, submit a separate sheet identifying the motions)

YES ☐ NO ☐

(PLEASE TYPE OR PRINT)

ATTORNEY'S NAME LAW OFFICE OF BORIS B. MAIDENADDRESS 251 Harvard Street, Ste 1, Brookline, MA 02446TELEPHONE NO. 617-739-6977